

Roohani, Elham (USANV)

From: Roohani, Elham (USANV)
Sent: Friday, March 2, 2018 3:33 PM
To: 'Karen A. Connolly'
Cc: Executive Assistant
Subject: RE: ECF No. 238.pdf

Dear Karen,

You filed your motion on June 22, 2017, based in part on an alleged conversation between your client and Mr. Humphries. Over two months ago, on December 29, 2017, Judge Navarro set this evidentiary hearing at your request. Thus, you have had over 2 months to submit your Rule 17 applications. Irrespective of whether Mr. Humphries was in the hospital in the last few weeks, you have known about this hearing since at least one month before any supposed hospitalization. I have previously advised you and the Court that I do not believe Mr. Humphries is an essential witness based on the legal standard applicable to the motion. Furthermore, I believe that any testimony Mr. Humphries does give will constitute perjury.

Therefore, I will not agree to a continuance. At this point, I have prepared for the hearing and I am ready to proceed. If you need a continuance, you need to file a motion and explain the necessity to Judge Navarro or seek your subpoenas on an emergency basis.

Regards,

Ellie

-----Original Message-----

From: Karen A. Connolly [mailto:advocate@kconnollylawyers.com]
Sent: Friday, March 2, 2018 1:41 PM
To: Roohani, Elham (USANV) <ERoohani@usa.doj.gov>
Cc: Executive Assistant <ExecutiveAssistant@kconnollylawyers.com>
Subject: ECF No. 238.pdf

Below is the order from the court denying my request re: service of subs . I don't see how we can proceed on March 9th. I'm going to have to either object or redo. Humphries is an essential witness . I submitted the motion as soon Ericsson gave me approval . As you know Humphries was in the hospital for quite a while. Do you want me to prepare a stip?